REMARKS

In response to the Office Action dated May 6, 2008, Applicants have amended the claims, which when considered with the following remarks, is deemed to place the present application in condition for allowance. Favorable consideration and allowance of all pending claims is respectfully requested. The amendments to the claims have been made in the interest of expediting prosecution of this case. Applicants reserve the right to prosecute the same or similar subject matter in this or another application.

Claims 1-5, 9, 11-12 and 30-32 are pending in this application. By this Amendment, Claims 1 and 2 have been amended and Claims 3, 31 and 32 have been cancelled without prejudice. Claim 1 has been amended to recite that the base oil of lubricating viscosity is "at least one Group II base oil of lubricating viscosity" and Claim 2 has been amended to recite that the base oil of lubricating viscosity is "at least two Group II base oils of lubricating viscosity". Support for these amendments can be found, for example, on page 10, lines 12-21 and in the working examples. Applicants respectfully submit that no new matter has been added to this application. Moreover, it is believed that the amendment to the claims as presented herein places the application in condition for allowance.

The Examiner provisionally rejected Claims 1-5, 9, 11, 12, 30 and 31 on the ground of nonstatutory obviousness-type double patenting as being unpatentable over Claims 1-46 of copending Application No. 11/046,994. Upon resolution of all outstanding issues remaining in the Office Action, Applicants will consider the timely submission of a Terminal Disclaimer.

REMARKS

In response to the Office Action dated May 6, 2008, Applicants have amended the claims, which when considered with the following remarks, is deemed to place the present application in condition for allowance. Favorable consideration and allowance of all pending claims is respectfully requested. The amendments to the claims have been made in the interest of expediting prosecution of this case. Applicants reserve the right to prosecute the same or similar subject matter in this or another application.

Claims 1-5, 9, 11-12 and 30-32 are pending in this application. By this Amendment, Claims 1 and 2 have been amended and Claims 3, 31 and 32 have been cancelled without prejudice. Claim 1 has been amended to recite that the base oil of lubricating viscosity is "at least one Group II base oil of lubricating viscosity" and Claim 2 has been amended to recite that the base oil of lubricating viscosity is "at least two Group II base oils of lubricating viscosity". Support for these amendments can be found, for example, on page 10, lines 12-21 and in the working examples. Applicants respectfully submit that no new matter has been added to this application. Moreover, it is believed that the amendment to the claims as presented herein places the application in condition for allowance.

The Examiner provisionally rejected Claims 1-5, 9, 11, 12, 30 and 31 on the ground of nonstatutory obviousness-type double patenting as being unpatentable over Claims 1-46 of copending Application No. 11/046,994. Upon resolution of all outstanding issues remaining in the Office Action, Applicants will consider the timely submission of a Terminal Disclaimer.

The Examiner has rejected Claims 1-5, 9, 11-12 and 30-32 under 35 U.S.C. §102(b) as being anticipated by or, in the alternative, under 35 U.S.C. §103(a) as obvious over Field et al. WO 99/18175 ("Field").

Nowhere does Field et al. disclose a low phosphorous or phosphorous-free lubricating internal combustion engine oil composition *consisting essentially of* "(a) a major amount of at least one Group II base oil of lubricating viscosity; (b) a minor deposit-inhibiting effective amount of at least one polyol ester ... (c) a diphenyl amine antioxidant; and (d) at least one additive selected from the group consisting of a metal detergent, rust inhibitor, dehazer, demulsifier, metal deactivator, friction modifier, viscosity index improver, extreme pressure agent, pour point depressant, antifoaming agent, co-solvent, package compatibiliser, metallic combustion improver, anti-knock compound, anti-icing additive, ashless dispersant and dye ..." as presently recited in amended Claim 1. By employing the transitional phrase "consisting essentially of" in a composition claim, the scope of the claim is limited to the specific ingredients recited in the claim and those that do not materially affect the basic and novel characteristic(s) of the composition. *Atlas Powder Co. v. I.E. Du Pont De Nemours & Co.*, 750 F.2d 1569, 1573-74, 224 USPQ 409, 411 (Fed. Cir. 1984).

In the Office Action, the Examiner states:

> In regards to the above prior-art rejections made over Field et al. it is clear from applicant's remarks that applicant has misread the scope of Field et al.'s invention when applicant insists that Field et al.'s invention requires: "three essentially components: (1) a lubricating oil, (2) a polyol ester and (3) a hindered phenol as an antioxidant" see page 8 of the REMARKS. A quick look at Field et al's specification at page 6, lines 2-9 makes it clear that the lubricating oil compositions "may be improved" by the further inclusion of an antioxidant, "more especially a hindered phenol antioxidant". Field et al. thus clearly discloses that a hindered

> phenol is not a required component! Hindered phenols are only optional components according to Field et al.'s invention. In fact antioxidants themselves are only an optional component of Field et al.'s invention. All because Field et al.'s Abstract of the invention mentions an antioxidant as a component of the composition, does not mean that all disclosed compositions must have a hindered phenol. The composition given in Field et al.'s abstract was given by way of illustration and not by way of limitation of compositions taught by Field et al. In any case, hindered phenols directly fall within the scope of many of the different types of additives claimed in applicant's independent claim 1, such as co-solvents. Finally, Field et al. also directly discloses that applicant's required diphenylamine antioxidant component, is an effective suitable antioxidant for Field et al's compositions, see page 12, lines 19-23.

In contrast to the Examiner's position, Field et al. do not disclose the claimed low phosphorous or phosphorous-free lubricating internal combustion engine oil composition. Rather, Field et al. disclose the following different lubricant compositions: (1) a lubricant composition containing a natural or synthetic base stock and various additives (see page 5 of Field et al.), (2) a lubricant composition containing an ester of a carboxylic acid having at most 30 carbon atoms and an alcohol, the ester having a molecular weight within the range of from 400 to 5000 and an amine-based friction modifier (see page 5 and Claim 14 of Field et al.), and (3) a lubricant composition containing an ester of a carboxylic acid having at most 30 carbon atoms and an alcohol, the ester having a molecular weight within the range of from 400 to 5000, an alkylene arene/diene copolymer viscosity modifer and a hindered phenol antioxidant (see page 6 and Claim 22 of Field et al.). Field et al. further disclose that if another antioxidant is present in the lubricant composition, it is in addition to the one provided in accordance with the invention, i.e., the hindered phenol antioxidant (see page 12 of Field et al.). In point of fact, Example 1 in Field et al. employs (1) a base stock, (2) a trimethylolpropane ester of mixed C_8 to C_{10} alkanoic acids, (3)

a viscosity modifer, (4) a hindered phenolic antioxidant, (5) an amine friction modifier and (6) the balance being a dispersant, ashless and metal detergent, antiwear agent, flow improver, corrosion inhibitor, *other antioxidant*, antifoam and diluents. Certainly, this is *not* a disclosure of each and every element of the low phosphorous or phosphorous-free lubricating internal combustion engine oil composition consisting essentially of components (a)-(d) as recited in amended Claim 1. Accordingly, Field et al. clearly requires a hindered phenol antioxidant when an antioxidant is included in the lubricant composition disclosed therein. Therefore, Field et al. cannot possibly anticipate the low phosphorous or phosphorous-free lubricating internal combustion engine oil composition set forth in amended Claim 1.

In the Office Action, the Examiner further states

> In any case, hindered phenols directly fall within the scope of many of the different types of additives claimed in applicant's independent claim 1, such as co-solvents.

This wholly unsupported position cannot possibly serve as a basis for this rejection. If it is the Examiner's position that hindered phenols fall within the scope of many of the different types of additives, the Examiner is respectfully requested to provide evidence that supports the Examiner's position.

There is likewise no suggestion or motivation in Field et al. of a low phosphorous or phosphorous-free lubricating internal combustion engine oil composition consisting essentially of "(a) a major amount of at least one Group II base oil of lubricating viscosity; (b) a minor deposit-inhibiting effective amount of at least one polyol ester ... (c) a diphenyl amine antioxidant; and (d) at least one additive selected from the group consisting of a metal detergent, rust inhibitor, dehazer, demulsifier, metal deactivator, friction modifier, viscosity index

improver, extreme pressure agent, pour point depressant, antifoaming agent, co-solvent, package compatibiliser, metallic combustion improver, anti-knock compound, anti-icing additive, ashless dispersant and dye ..." as presently set forth in amended Claim 1. In contrast, as stated above, the lubricating oil composition disclosed in Field et al. must contain a *hindered phenol* as an antioxidant *when an antioxidant is included in the composition.* Field et al. go on to state that if another antioxidant is present in the lubricating oil it is in addition to the one provided in accordance with the invention, i.e., the hindered phenol antioxidant (see page 12 of Field et al.). Thus, it is not seen in Field et al. where there is any suggestion, motivation for or even a hint of a low phosphorous or phosphorous-free lubricating internal combustion engine oil composition *consisting essentially of* "(a) a major amount of at least one Group II base oil of lubricating viscosity; (b) a minor deposit-inhibiting effective amount of at least one polyol ester ... (c) a diphenyl amine antioxidant; and (d) at least one additive selected from the group consisting of a metal detergent, rust inhibitor, dehazer, demulsifier, metal deactivator, friction modifier, viscosity index improver, extreme pressure agent, pour point depressant, antifoaming agent, co-solvent, package compatibiliser, metallic combustion improver, anti-knock compound, anti-icing additive, ashless dispersant and dye ..." as presently recited in amended Claim 1. Thus, Field et al. teach away from the presently recited low phosphorous or phosphorous-free lubricating internal combustion engine oil composition set forth in amended Claim 1. As such, amended Claim 1 is believed to be non-obvious, and therefore patentable, over Field et al.

With respect to Claim 30, nowhere in Field et al. is there any disclosure or suggestion of a low phosphorous or phosphorous-free lubricating internal combustion engine oil composition containing, *inter alia*, a dialkylated diphenylamine antioxidant. Rather, Field et al. simply

disclose that a diphenylamine antioxidant can be used. Certainly, this is not a disclosure of a dialkylated diphenylamine antioxidant. Accordingly, Claim 30 is further believed to be patentable over Field et al.

For the forgoing reasons, amended Claims 1, 2, 4, 5, 9, 11, 12 and 30 are believed to be patentable over Field et al. and allowance of these claims is respectfully requested.

The Examiner has rejected Claims 1-5, 9, 11-12 and 30-32 under 35 U.S.C. §102(b) as being anticipated by or, in the alternative, under 35 U.S.C. §103(a) as obvious over Culpon, Jr. U.S. Patent Number 5,151,205 ("Culpon").

It is well established that, for a claim to be anticipated, a single prior art reference must disclose each and every element of the claimed invention, *either expressly or inherently. Lewmar Marine, Inc. v. Barient, Inc.*, 827 F.2d 744, 747, 3 USPQ2d 1766, (Fed. Cir. 1987); *cert. denied*, 484 U.S. 1007 (1988). In contrast to the presently claimed invention, Culpon fails to disclose or suggest a low phosphorous or phosphorous-free lubricating *internal combustion engine oil* composition as presently recited in amended Claim 1. Rather, as acknowledged by the Examiner, Culpon discloses a lubricating composition for *chain and drive gear drive mechanisms*. Certainly, then, Culpon fails to disclose each and every element of the presently recited low phosphorous or phosphorous-free lubricating internal combustion engine oil composition of amended Claim 1. As such, Culpon cannot possibly anticipate the low phosphorous or phosphorous-free lubricating internal combustion engine oil composition as presently recited in amended Claim 1.

In the Office Action, the Examiner states:

> The prior-art rejection made over Culpon, Jr. U.S. Patent Number 5,151,205, has been reinstated in light of applicant's deletion of the New Matter limitation of: "wherein a tackifier is not present in the composition". Applicant's amended the preambles of independent claims 1 and 31 to include "internal combustion engine" to modify the oil composition is noted, but such is deemed to be only an intended use limitation for the claimed compositions. In any case, Culpon, Jr.'s chain and drive gear lubricating oil compositions are deemed to be effective lubricating compositions for internal combustion engines. It is noted that applicant has provided no factual data to support his argument that Culpon, Jr's lubricating compositions would not work as a lubricant oil for internal combustion engines. At best applicant has only discovered a new use for Culpon Jr's chain and drive gear lubricating oil compositions, but such is moot since applicant's claims are drawn towards compositions.

This wholly unsupported position cannot possibly serve as a basis for this rejection. First, the Examiner has not identified anywhere in Culpon where there is a disclosure that "Culpon, Jr.'s chain and drive gear lubricating oil compositions are deemed to be effective lubricating compositions for internal combustion engines." As such, the Examiner is respectfully requested *to identify with particularity (i.e., page number) where such disclosure can be found* in Culpon.

Second, it is also well established that "[I]f the claim preamble, when read in the context of the entire claim, recites limitations of the claim, or, if the claim preamble is 'necessary to give life, meaning, and vitality' to the claim, then the claim preamble should be construed as if in the balance of the claim." *Halliburton Energy Services Inc. v. M-I LLC*, 514 F3d 1244, 85 USPQ2d 1654, 1656 (Fed. Cir. 2008). As is the case here, the recitation "low phosphorous or phosphorous-free lubricating internal combustion engine oil composition" in amended Claim 1 is necessary to give life, meaning and vitality to the present claims as the purpose of the claims is

to provide a low phosphorous or phosphorous-free lubricating internal combustion engine oil composition. This is clearly set forth in the title of the present specification which states "ENGINE OIL COMPOSITIONS" as well as throughout the specification, e.g., on page 7, lines 10-18, which states:

> The present invention advantageously provides lubricating oil compositions which provide high antiwear, oxidation-corrosion and deposit protection in an engine, but which have only low levels of phosphorous, i.e., less than 0.1%, preferably not exceeding 0.08% and more preferably not exceeding 0.05% by weight and low levels of sulfur, i.e., not exceeding 0.2% by weight. Accordingly, the lubricating oil compositions of the present invention are more environmentally desirable than the higher phosphorous and sulfur lubricating oil compositions generally used in internal combustion engines because they facilitate longer catalytic converter life and activity while also providing the desired high wear and deposit protection and oxidation-corrosion inhibition.

Thus, the composition as presently recited in amended Claim 1 can only be regarded as being a low phosphorous or phosphorous-free lubricating internal combustion engine oil composition. Accordingly, the recitation "low phosphorous or phosphorous-free lubricating internal combustion engine oil composition" in amended Claim 1 must be considered when determining patentability of the claims. Nothing in Culpon would lead one skilled in the art to modify the chain and drive gear lubricants disclosed therein and arrive at the presently claimed low phosphorous or phosphorous-free lubricating internal combustion engine oil composition with any expectation of success. As such, amended Claim 1 is believed to be patentable over Culpon.

For the forgoing reasons, amended Claims 1, 2, 4, 5, 9, 11, 12 and 30 are believed to be patentable over Culpon and allowance of these claims is respectfully requested.

The Examiner has rejected Claims 1-5, 9, 11-12 and 30-32 under 35 U.S.C. §102(e) as being anticipated by or, in the alternative, under 35 U.S.C. §103(a) as obvious over Deckman et al. U.S. Patent Application Publication Number 2003/0166473 ("Deckman '473").

Nowhere does Deckman '473 disclose a low phosphorous or phosphorous-free lubricating internal combustion engine oil composition *consisting essentially of* "(a) a major amount of at least one Group II base oil of lubricating viscosity; (b) a minor deposit-inhibiting effective amount of at least one polyol ester ... (c) a diphenyl amine antioxidant; and (d) at least one additive selected from the group consisting of a metal detergent, rust inhibitor, dehazer, demulsifier, metal deactivator, friction modifier, viscosity index improver, extreme pressure agent, pour point depressant, antifoaming agent, co-solvent, package compatibiliser, metallic combustion improver, anti-knock compound, anti-icing additive, ashless dispersant and dye ..." as presently recited in amended Claim 1. By employing the transitional phrase "consisting essentially of" in a composition claim, the scope of the claim is limited to the specific ingredients recited in the claim and those that do not materially affect the basic and novel characteristic(s) of the composition. *Atlas Powder Co. v. I.E. Du Pont De Nemours & Co.*, 750 F.2d 1569, 1573-74, 224 USPQ 409, 411 (Fed. Cir. 1984).

Rather, Deckman '473 discloses certain groups of aromatic compounds, esters, mixtures of base stocks, and/or amorphous polymers such as amorphous olefin copolymers that can provide substantial reductions in the coefficient of friction and fuel economy improving benefits when admixed to lubricating oils without deleterious effects such as instability, undesirable high viscosities and deposits. Specifically, Deckman '473 discloses the following different lubricating oil compositions: (1) a lubricating oil composition containing a base oil together with

(a) pentaerythritol esters, (b) triol esters and (c) hydrocarbyl aromatics (see paragraph [0012] and Table 3 of Deckman '473); (2) a lubricating oil composition containing a synergistic mixture of (a) Group II or Group III paraffinic oil blends, including wax isomerate base oils, (b) hydrocarbyl aromatics and (c) polyol based esters (such as those derived from trimethylolpropane and mixed hydrocarbyl acids), (see paragraph [0018] and Tables 3-5 of Deckman '473); and (3) a lubricating oil composition containing (a) a significant amount of Group II or Group III base oils including wax isomerates and (b) amorphous olefin copolymers (see paragraph [0019] of Deckman '473). Thus, the pentaerythritol esters and/or hydrocarbyl aromatics and/or amorphous olefin copolymers of Deckman '473 unquestionably materially affects the basic and novel characteristics of his compositions by *absolutely* requiring the inclusion of at least one of the pentaerythritol esters and/or hydrocarbyl aromatics and/or amorphous olefin copolymers to allow the lubricating oil compositions to improve fuel economy. Since the low phosphorous or phosphorous-free lubricating internal combustion engine oil composition of amended Claim 1 does not contain pentaerythritol esters and/or hydrocarbyl aromatics and/or amorphous olefin copolymers, which are essential ingredients in the composition of Deckman '473, Deckman '473 cannot possibly anticipate the lubricating oil composition set forth in amended Claim 1.

There is likewise no suggestion or motivation in Deckman '473 of a low phosphorous or phosphorous-free lubricating internal combustion engine oil composition *consisting essentially of* "(a) a major amount of at least one Group II base oil of lubricating viscosity; (b) a minor deposit-inhibiting effective amount of at least one polyol ester ... (c) a diphenyl amine antioxidant; and (d) at least one additive selected from the group consisting of a metal detergent,

rust inhibitor, dehazer, demulsifier, metal deactivator, friction modifier, viscosity index improver, extreme pressure agent, pour point depressant, antifoaming agent, co-solvent, package compatibiliser, metallic combustion improver, anti-knock compound, anti-icing additive, corrosion-inhibitor, ashless dispersant and dye ..." as presently set forth in amended Claim 1.

In contrast, as stated above, the lubricating oil composition disclosed in Deckman '473 must contain at least one of the pentaerythritol esters and/or hydrocarbyl aromatics and/or amorphous olefin copolymers in the composition. Thus, it is not seen in Deckman '473 where there is any suggestion, motivation for or even a hint of a low phosphorous or phosphorous-free lubricating internal combustion engine oil composition *consisting essentially of* "(a) a major amount of at least one Group II base oil of lubricating viscosity; (b) a minor deposit-inhibiting effective amount of at least one polyol ester ... (c) a diphenyl amine antioxidant; and (d) at least one additive selected from the group consisting of a metal detergent, rust inhibitor, dehazer, demulsifier, metal deactivator, friction modifier, viscosity index improver, extreme pressure agent, pour point depressant, antifoaming agent, co-solvent, package compatibiliser, metallic combustion improver, anti-knock compound, anti-icing additive, corrosion-inhibitor, ashless dispersant and dye ..." as presently recited in amended Claim 1. Thus, Deckman '473 teach away from the presently recited low phosphorous or phosphorous-free lubricating internal combustion engine oil composition set forth in amended Claim 1. As such, amended Claim 1 is believed to be non-obvious, and therefore patentable, over Deckman '473.

For the forgoing reasons, amended Claims 1, 2, 4, 5, 9, 11, 12 and 30 are believed to be patentable over Deckman '473 and allowance of these claims is respectfully requested.

The Examiner has rejected Claims 1-5, 9, 11-12 and 30-32 under 35 U.S.C. §102(e) as being anticipated by or, in the alternative, under 35 U.S.C. §103(a) as obvious over Deckman, et al. U.S. Patent Number 6,869,917 ("Deckman '917").

Nowhere does Deckman '917 disclose a low phosphorous or phosphorous-free lubricating internal combustion engine oil composition *consisting essentially of* "(a) a major amount of at least one Group II base oil of lubricating viscosity; (b) a minor deposit-inhibiting effective amount of at least one polyol ester ... (c) a diphenyl amine antioxidant; and (d) at least one additive selected from the group consisting of a metal detergent, rust inhibitor, dehazer, demulsifier, metal deactivator, friction modifier, viscosity index improver, extreme pressure agent, pour point depressant, antifoaming agent, co-solvent, package compatibiliser, metallic combustion improver, anti-knock compound, anti-icing additive, ashless dispersant and dye ..." as presently recited in amended Claim 1. By employing the transitional phrase "consisting essentially of" in a composition claim, the scope of the claim is limited to the specific ingredients recited in the claim and those that do not materially affect the basic and novel characteristic(s) of the composition. *Atlas Powder Co. v. I.E. Du Pont De Nemours & Co.*, 750 F.2d 1569, 1573-74, 224 USPQ 409, 411 (Fed. Cir. 1984).

Rather, Deckman '917 discloses a formulated lubricant comprising a base stock comprising (a) a 5 cSt PAO comprising from about 40 to about 80 weight percent of 1-decene and from about 60 to about 20 weight percent of 1-dodecene based on the weight of the 5 cSt PAO; and (b) a 4 cSt PAO. Deckman '917 further discloses that the formulated lubricant may further include synthetic ester oils such as the esters of trimethylol propane, trimethylol butane, trimethylol ethane, pentaerythritol and/or dipentaerythritol with one or more monocarboxylic

acids containing from about 5 to about 10 carbon atoms as well as antioxidants such as hindered phenols, non-phenolics and aromatic amine antioxidants. Thus, the PAO base stock of Deckman '917 unquestionably materially affects the basic and novel characteristics of his compositions by *absolutely* requiring the inclusion of the PAO base stock to allow the lubricating oil compositions to exhibit superior Noack volatility at low pour points. Since the low phosphorous or phosphorous-free lubricating internal combustion engine oil composition of Claim 1 does not contain a PAO base stock, which is an essential ingredient in the composition of Deckman '917, Deckman '917 cannot possibly anticipate the low phosphorous or phosphorous-free lubricating internal combustion engine oil composition set forth in Claim 1.

There is likewise no suggestion or motivation in Deckman '917 of a low phosphorous or phosphorous-free lubricating internal combustion engine oil composition *consisting essentially of* "(a) a major amount of at least one Group II base oil of lubricating viscosity; (b) a minor deposit-inhibiting effective amount of at least one polyol ester ... (c) a diphenyl amine antioxidant; and (d) at least one additive selected from the group consisting of a metal detergent, rust inhibitor, dehazer, demulsifier, metal deactivator, friction modifier, viscosity index improver, extreme pressure agent, pour point depressant, antifoaming agent, co-solvent, package compatibiliser, metallic combustion improver, anti-knock compound, anti-icing additive, corrosion-inhibitor, ashless dispersant and dye ..." as presently set forth in amended Claim 1.

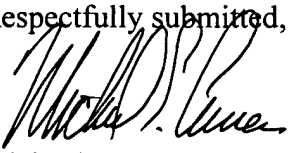
In contrast, as stated above, the lubricating oil composition disclosed in Deckman '917 must contain PAO base stock in the composition. Thus, it is not seen in Deckman '917 where there is any suggestion, motivation for or even a hint of a low phosphorous or phosphorous-free lubricating internal combustion engine oil composition *consisting essentially of* "(a) a major

amount of at least one Group II base oil of lubricating viscosity; (b) a minor deposit-inhibiting effective amount of at least one polyol ester ... (c) a diphenyl amine antioxidant; and (d) at least one additive selected from the group consisting of a metal detergent, rust inhibitor, dehazer, demulsifier, metal deactivator, friction modifier, viscosity index improver, extreme pressure agent, pour point depressant, antifoaming agent, co-solvent, package compatibiliser, metallic combustion improver, anti-knock compound, anti-icing additive, corrosion-inhibitor, ashless dispersant and dye ..." as presently recited in amended Claim 1. Thus, Deckman '917 teach away from the presently recited low phosphorous or phosphorous-free lubricating internal combustion engine oil composition set forth in amended Claim 1. As such, amended Claim 1 is believed to be non-obvious, and therefore patentable, over Deckman '917.

For the forgoing reasons, amended Claims 1, 2, 4, 5, 9, 11, 12 and 30 are believed to be patentable over Deckman '917 and allowance of these claims is respectfully requested.

For the foregoing reasons, Claims 1, 2, 4, 5, 9, 11, 12 and 30 as presented herein are believed to be in condition for allowance. Such early and favorable action is earnestly solicited.

Respectfully submitted,



Michael E. Carmen
Reg. No. 43,533
Attorney for Applicants

M. CARMEN & ASSOCIATES, PLLC
170 Old Country Road – Suite 400
Mineola, NY 11501
Phone: (516) 992-1848
Facsimile: (516) 739-0981
MEC:bg